UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA **Plaintiffs**,

٧.

Case No. 12-2039 (GAG)

COMMONWEALTH OF PUERTO RICO, et. al.

Defendants.

MOTION TO RESTRICT

COMES NOW the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau (PRPB), through the undersigned counsel, who respectfully alleges and prays as follows:

- On this same date, the undersigned will file a Response to the Monitor's Assessment Report, at Docket No. 1002.
- 2. Such *Response* consists of PRPB's Official Position with regards to the Federal Monitor's Assessment Report on the incidents involving the May 1st Protests.
- 3. PRPB's Official Position was referred to the Office of the Federal Monitor on October 25, 2018, according to the provisions established in paragraph 252 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department. PRPB's Response concerns only to the case participants.
- **4.** In abundance of caution, and in compliance with Standing Order No. 9, the appearing party respectfully requests that they be allowed to file the aforementioned document under seal and limit its viewing to case participants only.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and that they be allowed to file the aforementioned document under seal and limit its viewing to case participants only.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, December 7, 2018

WANDA VAZQUEZ GARCED

Secretary of Justice

WANDYMAR BURGOS VARGAS

Deputy in Charge of General Litigation

SUSANA PEÑAGARICANO BROWN

Director Federal Litigation and Bankruptcy

S/VALERIE CONCEPCIÓN CINTRÓN

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